

REMARKS

Claims 1-32 are pending in the present application. Claims 8, 9, 18, 21, 25, 26 and 28 have been amended herewith. Reconsideration of the claims is respectfully requested.

I. 35 U.S.C. § 112, Second Paragraph

The Examiner rejected Claims 18, 26 and 28 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter, which applicants regard as the invention. This rejection is respectfully traversed.

Claim 18 has been amended to provide proper antecedent basis for "actual position".

Claim 26 has been amended to provide proper antecedent basis for "the table".

Claim 28 has been amended to provide proper antecedent basis for "icons" and "sensible icon".

Therefore the rejection of Claims 18, 26 and 28 under 35 U.S.C. § 112, second paragraph has been overcome.

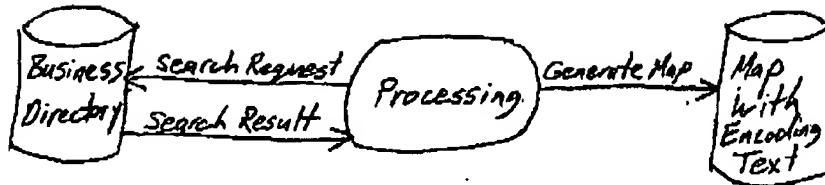
II. 35 U.S.C. § 102, Anticipation

The Examiner rejected Claims 1-12, 21, 23, 25, 27 and 29-32 under 35 U.S.C. § 102 as being anticipated by Musk (Pat. # 6,148,260). This rejection is respectfully traversed.

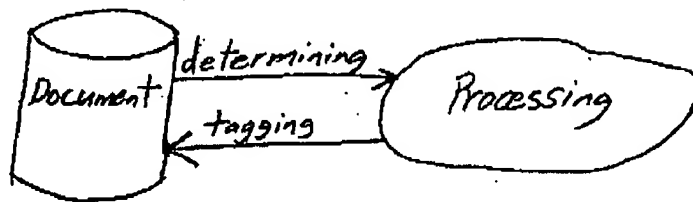
Claim 1 recites steps of: (i) determining geographic coordinates of the one or more geographic locations described or referenced in the document; (ii) encoding said geographic coordinates in a geographic address; and (iii) tagging said document with said geographic address. As can be seen, 'the document' is a part of steps (i) and (iii). In step (a), a determination is made as to geographic coordinates of the one or more geographic locations described in referenced *in the document*. In step (c), *the document* is tagged with a geographic address, such geographic address resulting from step (b), which recites encoding geographic coordinates (as determined by step (a)) in a geographic address.

Thus, per Claim 1, geographic coordinates of geographic location(s) described/referenced in a document are determined, and these geographic coordinates are encoded in a geographic address. This geographic address is tagged into the same document for which geographic locations are described/referenced in.

Thus, per Claim 1, there is explicitly recited (1) geographic location, (2) geographic coordinate and (3) geographic address. The 'document' has geographic locations described/referenced therein, and the 'document' is tagged with a geographic address. A geographic coordinate is determined from the described/referenced geographic location(s) in the document, and this geographic coordinate is encoded into the geographic address that is then tagged in this same document (which has geographic locations described/referenced therein). This is substantially different from the teachings of the cited Musk reference. Per Musk, there is a business directory and a map database. The business directory is searched, and a map is then generated after completion of such search (Col. 2, lines 61-67). Of notable distinction is that Musk does not search a map, but a business directory. Thus, to the extent the Examiner is interpreting Musk's map to read on the claimed 'document', there is no teaching of a step of determining geographic coordinates of the one or more geographic locations described or referenced in the document, as the map does not even exist when Musk searches the business directory (Musk column 2, lines 61-62). Alternatively, to the extent the Examiner is interpreting Musk's business directory to read on the claimed 'document', there is no teaching of tagging this business directory (the alleged 'document' in this alternative scenario) with a geographic address having encoded geographic coordinates. Quite succinctly, Claim 1 makes a determination of geographical coordinates for geographic locations in a document, and then tags this same document with a geographic address having encoded geographic coordinates. In contrast, Musk examines a business directory and generates a separate map (which is not a part of the business directory). This distinction is also graphically depicted below.



Musk (USPN 6,148,260)



Claim 1 (serial # 09/523,811)

Thus, Musk does not teach the claimed 'document' for which the two recited steps pertain to (determining and tagging). As every element of the claimed invention is not identically shown in a single reference, it is shown that Claim 1 is not anticipated by the cited Musk reference.

Still further with respect to Claim 1, the cited Musk reference does not teach encoding of geographic coordinates into a geographic address and tagging the document with such geographic address. In rejecting Claim 1, the Examiner states that this step is taught by Musk at Col. 3, lines 27-45. Applicants show that there, Musk states:

FIG. 4 illustrates the routine as step F in FIG. 3 for generating the map with text. First, in step L, the map image is generated using a format such as GIF. Next, the text to displayed on the map is generated (step M). Finally, the text is encoded into the pixels of the graphics, along with the desired location, in step N.

In one embodiment, a first line of 162 pixels may be used to encode the text information. Alternately, two lines may be used. This limited number of lines will still be visible to the user, but will look like a border and not detract from the image displayed.

In one embodiment, the text can be simply an indication of the location on the map to produce an icon symbolizing the desired business location. The first two bits of the pixel line could indicate a key as to whether the encoding is done as black and white pixels, or a particular color component. In one embodiment, five words of 32 bits are used, with the words indicating the latitude and longitude in two levels of fineness (i.e., minutes and seconds) to pinpoint the location where an icon can be displayed.

As can be seen, this passage discusses the encoding of text information into pixels to be combined with a map image. This can also be seen by Musk's Figure 4. This 'text' cannot be reasonably equated with the claimed 'geographic coordinates' as this text is *not determined from* geographic locations described in the map. Claim 1 expressly recites a step of determining geographic coordinates of the one or more *geographic locations described or referenced in the document*. The text that Musk encodes for inclusion in the map comes from a directory database, which is different from the map. For similar reasons to those articulated above regarding the first missing claimed element (the 'document'), Claim 1 determines geographic coordinates of geographic locations described or referenced in a document, and then tags *this same document* with encoded information (a geographic address). A teaching of encoding text resulting from a business directory search and then inclusion of this encoded text in a separate map does not teach this claimed step of encoding of geographic coordinates (determined from a document) into a geographic address that is then tagged into this same document. Thus, Claim 1 is further shown to not be anticipated by the cited reference.

Applicants initially traverse the rejection of Claims 2-7 for reasons given above with respect to Claim 1 (of which Claims 2-7 depend upon).

Still further with respect to Claim 2, Applicants urge that the cited reference does not teach the additional claimed step of "tagging said document with one or a plurality of geographic attributes related to the geographic location described or referenced in the document". Thus, per Claim 2 (which is dependent upon Claim 1 and thus

includes/incorporates all steps recited in Claim 1), there are two tagging steps: (i) tagging the document with a geographic address, and (ii) tagging the document with geographic attributes. In rejecting Claim 2, the Examiner cites Musk's teaching at col. 3, lines 27-45 as teaching this additional tagging step. This is the identical passage that is recited by the Examiner in rejecting the tagging step recited in Claim 1. This passage does not teach two tagging operations, and Claim 2 expressly recites two different taggings: (i) tagging said document with said geographic address, and (ii) tagging said document with one or a plurality of geographic attributes related to the geographic location described or referenced in the document. As can be seen, per Claim 2 the document is tagged with both a geographic address and geographic attributes. The passage cited in rejecting Claim 2 (which is the same passage cited by the Examiner in rejecting Claim 1) only describes encoding a map latitude and longitude information to pinpoint the location for displaying an icon on the map. Such latitude and longitude information does not teach both a *geographic address and geographic attributes*, as required by Claim 2. Thus, Claim 2 is shown to not be anticipated by the cited reference.

Claim 2 advantageously provides a document having both geographic address and geographic attribute information, thereby enabling an ability to search and retrieve documents by means of a query that specifies cartographic coordinates and/or attributes of the locations to search inside such geographic area (Specification page 15, lines 13-25).

Further with respect to Claim 4, such claim recites that the geographic coordinates of the geographic location described or referenced *in the document* (for which the determination is made) are expressed in terms of longitude and latitude. These determined geographic coordinates are then encoded in a geographic address and tagged *to the document*. For similar reasons to those given above with respect to Claim 1, the cited reference does not teach a given document that both a determining step (of longitude and latitude geographic coordinates) and tagging step are performed on. Thus, Claim 4 is shown to not be anticipated by the cited reference.

Further with respect to Claim 5, such claim further described the encoding step of Claim 1, and specifically recites computing *absolute* geographic coordinates of a location described/referenced in a document, and including such *absolute* geographic coordinates

in the geographic address tagged in this same document. In rejecting Claim 5, the Examiner states that Claim 5 is "directed towards a method for performing the steps found in Claim 4" and "therefore is similarly rejected". Applicants initially show error for similar reasons to those described above regarding Claim 4. In addition, Claim 5 requires that the geographic coordinated encoded and tagged are *absolute* geographic coordinates. The cited reference does not teach any use of *absolute* geographic coordinates. Thus, Claim 5 is further shown to not be anticipated by the cited reference.

With respect to Claim 8, Applicants have amended such claim to further emphasize features of the invention recited therein. Amended Claim 8 recites a tag *having both a tag identifier and a geographic address*, such that the tag advantageously provides a geographic search capability for the document. The cited Musk reference teaches a map having encoded coordinate information embedded as raster scan data, and thus such encoded coordinate information is not searchable. In fact, Musk requires that such coordinate information be raster image data (and thus not searchable) in order that such information can pass seamlessly in a Java environment (Musk Col. 1, lines 48-53; Col. 3, lines 53-57). It is thus shown that amended Claim 8 is not anticipated by the cited reference.

Applicants initially traverse the rejection of Claims 9-12, 21, 23, 25, 27 and 29-31 for reasons given above regarding Claim 8 (of which Claims 9-12, 21, 23, 25, 27 and 29-31 depend upon).

Further with respect to Claim 9, Applicants have amended such claim to be in independent form, to include all features of original Claim 8, and to specify that the attribute(s) are geographic attributes related to the described/referenced geographic location (as contrasted to the geographic address). As amended, Claim 9 recites a tag having both (i) a geographic address, and (ii) geographic attribute(s). The cited Musk reference does not teach such a tag. In rejecting Claim 9, the Examiner cites Musk's two-bit color field as reading on the claimed attributes. Applicants show that these two bits are attributes of the encoded coordinates (latitude and longitude, see Musk Col. 3, lines 37-57). The Examiner has equated these encoded coordinates to be the claimed geographic address. However, while Claim 9 does recite a *geographic address*, the attributes are related to the geographic *location* described in the document. The

geographic location is different from the geographic address, and an assertion of attributes relating to a geographic address does not establish a teaching of attributes that relate to a geographic location described/referenced in the document. Quite simply, the claimed geographic address is different from the claimed geographic location, and an alleged teaching of attributes pertaining to what color to display geographic coordinates in does not teach attributes relating to geographic locations described/referenced in the document. Applicants have amended Claim 9 to further clarify and emphasize this distinction. Thus, it is shown that amended Claim 9 is not anticipated by the cited reference.

Further with respect to Claim 10, Applicants show that the cited reference does not teach that the document – which is subject to both a determining step and a tagging step, as described above with respect to Claim 1 – is an HTML document. In rejecting Claim 10, the Examiner states that “Nagai discloses” an HTML web page. Applicants show error, as Claim 10 is being rejected under 35 USC 102 using a cited Musk reference, and not a Nagai reference. Thus, the Examiner has failed to properly establish that every element of the invention recited in Claim 10 is taught in a single reference, and thus Claim 10 has been erroneously rejected as being anticipated by Musk.

Further with respect to Claim 11, Applicants traverse for similar further reasons to those given above with respect to Claim 4.

Further with respect to Claim 12, Applicants traverse for similar further reasons to those given above with respect to Claim 5.

Further with respect to Claim 21 (and dependent Claims 23, 25, 27 and 29-31), Applicants have amended such claim to clarify that the retrieved absolute geographic coordinates are used to map the geographic location. In rejecting Claim 21, the Examiner states that encoding a map with latitude and longitude information teaches the claimed mapping step, and that Musk’s retrieval of encoded coordinates from the encoded information teaches the claimed retrieving step. Applicants show that, as amended, Claim 21 expressly recites that the geographic coordinates *that are retrieved* are used to map the geographic location. The Musk retrieval of encoded coordinates are merely displayed as part of the map display, and are not used in any way to map the geographic location *according to* the retrieved absolute geographic coordinates. Per Claim 21, the

retrieved coordinates are synergistically used as a part of a subsequent mapping of the geographic location. In contrast, the Musk retrieved coordinates are merely displayed on a map (as they are a part of the raster image). Thus, Claim 21 (and dependent Claims 23, 25, 27 and 29-31) is further shown to not be anticipated by the cited reference.

With respect to Claim 25, such claim has been amended to provide proper antecedent basis the "the reference point". Applicants traverse the rejection of Claim 25 for reasons given below with respect to Claim 13 (of which Claim 25 now depends upon).

With respect to Claim 32, Applicants traverse for similar reasons to those given above with respect to Claim 1 and urge that the cited reference does not teach the claimed 'document' for which the two recited steps pertain to (determining and tagging). As every element of the claimed invention is not identically shown in a single reference, it is shown that Claim 32 is not anticipated by the cited Musk reference.

Therefore, the rejection of Claims 1-12, 21, 23, 25, 27 and 29-32 under 35 U.S.C. § 102 has been overcome.

III. 35 U.S.C. § 103, Obviousness

A. The Examiner rejected Claims 13-16 and 18-20 under 35 U.S.C. § 103 as being unpatentable over Musk (Pat. # 6,148,260) in view of Narayanaswami (Pat. # 6,504,571). This rejection is respectfully traversed.

With respect to Claim 13 (and dependent Claims 14-16, 18-20; and amended Claim 25 which now depends upon Claim 13), Applicants initially traverse for similar reasons to those given above with respect to Claim 8 (of which Claim 13 depends upon), and urges that none of the cited references teach or suggest a tag having both a tag identifier and a geographic address, such that the tag provides a geographic search capability for the document.

Further with respect to Claim 13 (and dependent Claims 14-16, 18-20 and 25), and in particular regarding the cited Narayanaswami reference, Application 09/523,811 and the Narayanaswami Patent 6,504,571 were, at the time the invention of Application 09/523,811 was made, owned by International Business Machines Corporation", and thus

Patent 6,504,571 is disqualified as being a valid reference in a 35 USC 103 rejection, per 35 USC 103(c).

Therefore, the rejection of Claims 13-16 and 18-20 under 35 U.S.C. § 103 has been overcome.

B. The Examiner rejected Claims 22, 24, 26 and 28 under 35 U.S.C. § 103 as being unpatentable over Musk (Pat. # 6,148,260) in view of Nagai (Pat. # 6,138,072). This rejection is respectfully traversed.

With respect to Claim 22 (and dependent Claims 24, 26 and 28), Applicants initially traverse for similar reasons to those given above with respect to Claims 8 and 21 (of which Claim 22 depends upon), and urges that none of the cited references teach or suggest (i) a tag having both a tag identifier and a geographic address, such that the tag provides a geographic search capability for the document (Claim 8), or (ii) that the retrieved absolute geographic coordinates is used to map the geographic location (Claim 21).

Further with respect to Claim 24 (and dependent Claim 28), none of the cited references teach or suggest the claimed step of “pointing to the network address *of the document*” (emphasis added). In rejecting Claim 24, the Examiner acknowledges that the cited Musk reference does not teach this claimed step, but states that Nagai teaches that after a user has selected the object’s representation, the URL is retrieved and transmitted for retrieval of that object’s web page. Applicants urge that the URL and web page as taught by Nagai are with respect to the selected object displayed on the screen, and are not with respect to ‘the document’ having a tag that includes both a geographic address and geographic attribute(s) (per independent Claim 8). Rather, the Nagai URL that is retrieved is maintained in a separate, unrelated data table of registered homepage URLs (Col. 2, lines 1-4; Figure 7). Thus, it is shown that none of the cited references teach or suggest the claimed feature of “pointing to the network address *of the document*” (‘the document’ having a tag that includes both a geographic address and geographic

attribute(s)). Therefore, Claim 24 (and dependent Claim 28) is further shown to not be obvious in view of the cited references¹.

Therefore, the rejection of Claims 22, 24, 26 and 28 under 35 U.S.C. § 103 has been overcome.

IV. Objection to Claims

The Examiner stated that Claim 17 was objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. While Applicants graciously acknowledge the allowability of such claim, it is respectfully shown that Claim 17 is allowable in its current form as being ultimately dependent upon Claim 13 (which is shown above to be allowable).

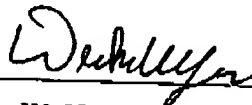
¹ To establish prima facie obviousness of a claimed invention, all of the claim limitations must be taught or suggested by the prior art. MPEP 2143.03. *See also, In re Royka*, 490 F.2d 580 (C.C.P.A. 1974) (emphasis added by Applicants).

V. Conclusion

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,



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